

UNDER SEAL

FILED
Charlotte, NC

NOV 19 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

Clerk, US District Court
Western District NC

UNITED STATES OF AMERICA

v.

(1) JARVIS JONES, a/k/a "JABO,"



DOCKET NO. 3:24-cr-00232-MOC

BILL OF INDICTMENT

Violations: 18 U.S.C. § 922(g)
18 U.S.C. § 924(c)
21 U.S.C. § 841(a)(1)

THE GRAND JURY CHARGES:

COUNT ONE

(Possession of Firearm by Prohibited Person)

On or about September 21, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a "JABO,"

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Springfield Armory Hellcat 9mm pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Possession of Firearm by Prohibited Person)

On or about September 21, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,



knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Kel-Tec PF-9, 9mm pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

(Possession of Firearm by Prohibited Person)

On or about September 21, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

[REDACTED]

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Rock Island Armory 1911, 10mm pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

(Cocaine Distribution)

On or about January 11, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendants,

(1) JARVIS JONES, a/k/a “JABO,”

[REDACTED]

aiding and abetting one another, did knowingly and intentionally distribute a controlled substance, that is, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Heroin Distribution)

On or about January 17, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly and intentionally distribute a controlled substance, that is, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Methamphetamine and Fentanyl Distribution)

On or about February 7, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly and intentionally distribute controlled substances, those are, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”) and methamphetamine (actual), both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

With respect to defendant **(1) JARVIS JONES, a/k/a “JABO,”** the offense charged in Count Six involved fifty (50) grams or more of methamphetamine (actual). Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

Quantity of Fentanyl Involved

With respect to defendant **(1) JARVIS JONES, a/k/a “JABO,”** the offense charged in Count Six involved a quantity of fentanyl. Accordingly, Title 21, United States Code, Section 841(b)(1)(C) applies.

Prior Conviction Pursuant to Title 21, United States Code, Sections 841(b)(1)(A) and 851

Before defendant **(1) JARVIS JONES, a/k/a “JABO,”** committed the offense charged in Count Six, he had a final conviction for a serious drug felony, namely, conspiracy to distribute and possess with intent to distribute cocaine base, aiding and abetting, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(C), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in Count Six.

COUNT SEVEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 7, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Distribution of a Controlled Substance, as set forth in Count Six of this Bill of Indictment and incorporated by reference herein, in violation of

Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT EIGHT

(Methamphetamine Distribution)

On or about March 12, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly and intentionally distribute a controlled substance, that is, fifty (50) grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Prior Conviction Pursuant to Title 21, United States Code, Sections 841(b)(1)(A) and 851

Before defendant (1) JARVIS JONES, a/k/a “JABO,” committed the offense charged in Count Eight, he had a final conviction for a serious drug felony, namely, conspiracy to distribute and possess with intent to distribute cocaine base, aiding and abetting, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(C), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in Count Eight.

COUNT NINE

(Possession of Firearm by Prohibited Person)

On or about March 15, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, those are, one (1) Glock 22, .40 caliber pistol, and one (1) Magnum Research, Desert Eagle .357 caliber pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

(Methamphetamine Distribution)

On or about March 15, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly and intentionally distribute a controlled substance, that is, fifty (50) grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**Prior Conviction Pursuant to Title 21, United States Code, Sections 841(b)(1)(A)
and 851**

Before defendant **(1) JARVIS JONES, a/k/a “JABO,”** committed the offense charged in Count Ten, he had a final conviction for a serious drug felony, namely, conspiracy to distribute and possess with intent to distribute cocaine base, aiding and abetting, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(C), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in Count Ten.

COUNT ELEVEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 15, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) JARVIS JONES, a/k/a “JABO,”

did knowingly possess one or more firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute a Controlled Substance, as set forth in Count Ten of this Bill of Indictment and incorporated by reference herein, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWELVE

(Possession of Firearm by Prohibited Person)

On or about February 10, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,



knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Glock 43x, 9mm caliber pistol, and a Glock magazine with 9mm ammunition, all in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTEEN

(Possession of Firearm by Prohibited Person)

On or about August 13, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

[REDACTED]

knowing that they had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Glock 47, .40 caliber pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

(Possession with Intent to Distribute Cocaine, Crack Cocaine, and Methamphetamine)

On or about August 13, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

[REDACTED]

did knowingly and intentionally possess with intent to distribute controlled substances, that is, a quantity of a mixture and substance containing a detectable amount of cocaine, a quantity of a mixture and substance containing a detectable amount of methamphetamine, and a quantity of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), all Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about August 13, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

[REDACTED]

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute a Controlled Substance, as set forth in Count Fourteen of this Bill of Indictment and incorporated by reference herein, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d): all firearms and ammunition involved in, used, or intended to be used in the violations alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the following property subject to forfeiture on the grounds stated above:

- (a) One Springfield Armory Hellcat 9mm pistol (SN: BY222088) and all associated magazines and ammunition seized on or about September 13, 2023.
- (b) One Rock Island Armory 1911, 10mm pistol (SN: RIA22202645) and all associated magazines and ammunition seized on or about September 13, 2023.
- (c) One Kel-Tec PF-9, 9mm pistol (SN: RF834) and all associated magazines and ammunition seized on or about September 13, 2023.
- (d) One Glock 22, .40 caliber pistol (SN:NMK163) and all associated magazines and ammunition seized on or about March 15, 2024.
- (e) One Magnum Research, Desert Eagle .357 caliber pistol (SN: DK0083974) and all associated magazines and ammunition seized on or about March 15, 2024.
- (f) one (1) Glock 43x, 9mm caliber pistol (SN: BPUD791) and all associated magazines and ammunition seized on or about February 10, 2024.
- (g) one (1) Glock 47, .40 caliber pistol (SN: BUWV156) and all associated magazines and ammunition seized on or about August 13, 2024.

A TRUE BILL

FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY



BRANDON L. BOYKIN
ASSISTANT UNITED STATES ATTORNEY